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March 19, 2021

**VIA ECF**

The Honorable Ronnie Abrams  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Castaneda v. Marriott International, Inc., et al.*, No. 19-CV-00725-RA-GWG

Dear Judge Abrams:

We represent Defendant Marriott International, Inc. ("Defendant") in the above-referenced matter. We write together with Counsel to Plaintiff Iris Castaneda ("Plaintiff") to request an extension of time to submit a status report from today to a date after April 9, 2021 and to request that the March 26, 2021 conference scheduled for 1:30 PM be adjourned. This is the Parties' first request for an extension of this deadline.

Discovery was scheduled to conclude on March 17, 2021, which remained open to that date for purposes of taking Plaintiff's deposition. The Parties convened the deposition on March 17 over Zoom and completed approximately six hours of testimony. However, the inefficiencies created by Zoom and the volume of Plaintiff's allegations and claims, made it apparent to both sides that the deposition would not be completed within seven hours. Rather than petition the Court for an extension of time to complete the deposition under Rule 30, the Parties jointly agreed to adjourn the deposition just after 6:00 PM. The Parties have agreed in principal to the parameters for the continued deposition, and will reduce their agreement to stipulation in short-order.

The Parties advised Magistrate Gorenstein of this development and requested an extension to complete the deposition until April 9, 2021. The Court granted this request. See Docket No. 75. Accordingly, the Parties believe it appropriate to adjourn the date to submit a status report to Your Honor and to participate in a status conference to dates selected by the Court after April 9, 2021.

We thank the Court for its consideration of this request.

Application granted. The conference scheduled for March 26, 2021 is hereby adjourned to April 23, 2021 at 12:45 p.m. The joint letter shall be due April 16, 2021.

SO ORDERED.

Respectfully submitted,

/s/ Brian D. Murphy

Brian D. Murphy  
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Hon. Ronnie Abrams  
03/22/2021